

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

<p>CENTER FOR WORKPLACE COMPLIANCE (f/k/a EQUAL EMPLOYMENT ADVISORY COUNCIL),</p> <p style="text-align: center;">Plaintiff and Counterclaim Defendant,</p> <p>v.</p> <p>LITTLER MENDELSON, P.C., LANCE E. GIBBONS, THERESA GOKTURK (a/k/a CHRIS GOKTURK), and DOE DEFENDANTS 1-10, INCLUSIVE,</p> <p style="text-align: center;">Defendants and Counterclaimants.</p>	<p>Case No. 1:20-cv-01387-AJT-JFA</p>
---	---------------------------------------

**PLAINTIFF CENTER FOR WORKPLACE COMPLIANCE’S
MOTION FOR A PROTECTIVE ORDER**

Plaintiff Center for Workplace Compliance (“CWC”), by counsel, moves this Court for a protective order to govern discovery in the above-captioned matter. Support for this motion is set forth in the Memorandum of Points and Authorities in Support of CWC’s Motion, the declaration of Mark Krotoski and the exhibits attached thereto, the pleadings and papers on file in this action, and all other papers and arguments submitted in connection with this matter. A proposed protective order granting the requested relief is attached as Exhibit A.

STATEMENT OF COUNSEL PURSUANT TO LOCAL RULE 37(E)

Counsel for CWC contacted John A. Burlingame, counsel for Defendants Littler Mendelson, P.C. and Theresa Gokturk, and Robert C. Gill, counsel for Defendant Lance E. Gibbons, by e-mail and telephone in several attempts to resolve the disputes. Counsel made good faith efforts to resolve the issues, but were not able to reach agreement.

Dated: February 19, 2021

Respectfully submitted,

MORGAN LEWIS & BOCKIUS LLP

By: /s/ Mark L. Krotoski

/s/ J. Kevin Fee

Mark L. Krotoski (*pro hac vice*)

J. Kevin Fee (Virginia Bar. No. 88376)

1111 Pennsylvania Ave. NW

Washington, DC 20004-2541

Telephone: +1.202.739.3000

Facsimile: +1.202.739.3001

Thomas Y. Nolan (*pro hac vice*)

1400 Page Mill Road

Palo Alto, CA 94304

Telephone: +1.650.843.4000

Facsimile: +1.650.843.4001

mark.krotoski@morganlewis.com

kevin.fee@morganlewis.com

thomas.nolan@morganlewis.com

*Attorneys for Plaintiff Center for Workplace
Compliance*

CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2021, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notice of filing to all counsel of record:¹

By: /s/ J. Kevin Fee
J. Kevin Fee

¹ A courtesy copy will be delivered to chambers within twenty-four hours in accordance with the Alexandria Division's chambers-copy rules.